



Salt River PIMA-MARICOPA INDIAN COMMUNITY

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Rebecca Johnson
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Western Area Power Administration,
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RE: Salt River Pima-Maricopa Indian Community Comments

On: Western Area Power Administration's Rocky Mountain Region and Colorado River Storage Project Management Center Notice of Recommendation to Pursue Final Negotiations for Southwest Power Pool Regional Transmission Organization Membership, and for Expanded Participation by Upper Great Plains Region in SPP RTO (88 Fed. Reg. 26298 (April 28, 2023))

Dear Ms. Johnson:

The Salt River Pima-Maricopa Indian Community (SRPMIC) has federal power agreements with the Western Area Power Administration (WAPA) and the United States Bureau of Reclamation (USBR) for Salt Lake City Area Integrated Project Power (SLCA/IP) power and Boulder Canyon Project (BCP) power. SRPMIC has been commenting in the WAPA CRSP SPP process extensively and is not satisfied with the responses to the concerns raised by SRPMIC representatives regarding the impacts of the CRSP RTO decision upon the SRPMIC and other utilities like SRP in the west who will not be in the SPP RTO.

We do not know the impact of the proposed changes to the value of the SLCA/IP power that Salt River Project receives on behalf of SRPMIC. We also do not understand how SLCA/IP power will be scheduled and delivered to SRP in such a proposal in the future or how the costs to deliver such power to SRP will change. SRPMIC representatives are very familiar with the process at BCP where the contracts and WAPA dynamic scheduling enable all BCP contractors access to their BCP power. That seemed to work for WAPA, SRP and others in the WECC, but we have not seen this CRSP SPP process enable those type of discussions and solutions to sufficiently be discussed or mature.

Finally, through participation we have learned these issues are very complicated and can have impacts upon all CRSP contractors for the entire future in the WECC and with their federal hydropower contracts. WAPA worked after the 2005 Energy Policy Act to market SLCA/IP power to over 50 new tribes that today buy CRSP power or benefit from it. We know only a handful are even aware of these issues and engage with WAPA rarely on their contracts.

Therefore, given the long-term consequences of the CRSP SPP RTO decisions, we must respectfully request the WAPA Administrator terminate this process until WAPA can adequately study the impacts upon all WAPA CRSP Contractors and attempt to mitigate those impacts, if any. The No Action Alternative is the safest alternative given the current process.

SRPMIC Authorized Contractual Representative



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CC:

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